Mr. Phil McKittrick
Polyfoam Packers Corporation
955 Woodland Avenue
Michigan City, IN 46360

Re: 091-15559-00079
Significant Permit Modification to
Part 70 permit No.: T091-7666-00079

Dear Mr. McKittrick:

Polyfoam Packers Corporation was issued a Part 70 permit on October 14, 1999 for operation of a polystyrene shape molding operation. A letter requesting changes to this permit was received on November 26, 2001. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the operation of the following equipment:

(a) Sixteen (16) post expansion storage silos, with a total maximum storage capacity of , exhausting to stack F28.

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu per hour:

(1) Sterling heater, rated at 0.4 MMBtu/hr, identified as MS-11;
(2) Grinnell heater, rated at 0.4 MMBtu/hr, identified as MS-12;
(3) Trane heater, rated at 0.25 MMBtu/hr, identified as MS-13;
(4) Reznor heater, rated at 0.3 MMBtu/hr, identified as MS-14;
(5) Trane heater, rated at 0.25 MMBtu/hr, identified as MS-15;
(6) Dayton heater, rated at 0.4 MMBtu/hr, identified as MS-16;
(7) Dayton heater, rated at 0.2 MMBtu/hr, identified as MS-17;
(8) Thermo Cycler, rated at 0.4 MMBtu/hr, identified as MS-18;
(9) Thermo Cycler, rated at 0.58 MMBtu/hr, identified as MS-19;
(10) Dayton heater, rated at 0.06 MMBtu/hr, identified as MS-20;
(11) Trane heater, rated at 0.25 MMBtu/hr, identified as MS-21;
(12) Dayton heater, rated at 0.4 MMBtu/hr, identified as MS-22;
(13) Dayton heater, rated at 0.4 MMBtu/hr, identified as MS-23;
(14) Trane rooftop, rated at 0.166 MMBtu/hr, identified as MS-24;
(15) Trane rooftop, rated at 0.166 MMBtu/hr, identified as MS-25;
(16) Trane rooftop, rated at 0.06 MMBtu/hr, identified as MS-26;
(17) Thermo Cycler, rated at 0.4 MMBtu/hr, identified as MS-27;
(18) Thermo Cycler, rated at 0.4 MMBtu/hr, identified as MS-28;

(c) Welding operations consisting of the following equipment:

(1) Miller matic wire welder, identified as MS-1;
(2) Small torch, identified as MS-2;
(3) Dialarc stick welder, identified as MS-3;
(4) Dialarc stick welder, identified as MS-4;
(5) Miller matic wire welder, identified as MS-5;
(6) Medium torch, identified as MS-6;
(7) Miller matic wire welder, identified as MS-7;
(8) Medium torch set, identified as MS-8;
(9) Dialarc stick welder, identified as MS-9; and
(10) Medium torch set, identified as MS-10.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call Nishat Hydari at (973) 575-2555, ext. 3216, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
NH/EVP
cc: File - LaPorte County
U.S. EPA, Region V
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section - Karen Nowak
Administrative and Development - Cynthia Bymaster
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT

Polyfoam Packers Corporation
955 Woodland Avenue
Michigan City, Indiana 46360

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-7666-00079	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: October 14, 1999 Expiration Date: October 14, 2004

First Administrative Amendment 091-11627-00079, issued on January 18, 2000
Second Administrative Amendment 091-13602-00079, issued on January 17, 2001
First Significant Permit Modification 091-14496-00079, issued on November 20, 2001

Second Significant Permit Modification 091-15559-00079	Pages Affected: 7, 29, 30, 31, 32
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 22, 2002

28) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-31.

29) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-32.

30) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-33.

31) One (1) molding press, model number EHV-C, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-34.

32) Sixteen (16) post expansion storage silos, identified as F28, each with a total maximum storage capacity of 972 pounds.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.

2) Welding operations consisting of the following equipment:

(a) Miller matic wire welder, identified as MS-1;
(b) Small torch, identified as MS-2;
(c) Dialarc stick welder, identified as MS-3;
(d) Dialarc stick welder, identified as MS-4;
(e) Miller matic wire welder, identified as MS-5;
(f) Medium torch, identified as MS-6;
(g) Miller matic wire welder, identified as MS-7;
(h) Medium torch set, identified as MS-8;
(i) Dialarc stick welder, identified as MS-9; and
(j) Medium torch set, identified as MS-10.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22).

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Thirty-one (31) foam polystyrene storage silo with a maximum storage silo with a maximum storage capacity of 76,000 pounds.

One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

One (1) pre expander, rated at 500 pounds per hour, exhausting to stack S-5.

One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

One (1) molding press, Kohler model 609, rated at 400 pounds per hour, and exhausting to Stack S-10.

One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.

One (1) molding press, model number 813, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-29.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-30.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-31.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-32.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-33.

One (1) molding press, model number EHV-C, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-34.

Sixteen (16) post expansion storage silos, identified as F28, each with a total maximum storage capacity of 972 pounds.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the molding process and the sixteen (16) post expansion storage silos shall use no more than 26.77 tons per month of pentane (VOC) (at 77.5% flash off). This usage limit is required to limit the potential to emit of VOC to 20.75 tons per month. Compliance with this limit makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.2.2 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the best available control technology (BACT) for the expandable polystyrene molding process shall be the use of the lowest available pentane content material without add-on control equipment. Also, the Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

D.2.3 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

BACT - The OAM, IDEM has determined the BACT for the pre expander, rated at 500 pounds per hour and # 2 pre expander, rated at 1500 pounds per hour shall be as follows:

(a) The molding compound shall contain a maximum average of 5.5% pentane.

(b) Polyfoam will continue to work with resin suppliers to seek to obtain resins with lower VOC content. Polyfoam will also continue to evaluate the alternate materials.

(c) The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

D.2.4 New Facilities, General Reduction Requirements [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the Best Available Control Technology (BACT) for the six (6) molding presses, shall be the following:

(a) The VOC usage for the six (6) molding presses, shall be limited to 155.22 tons per twelve (12) consecutive month period.

(b) The molding compound shall contain a maximum average of 5.5% pentane.

(c) The Permittee shall continuously search for material with lower pentane and VOC content. The applicant shall submit an annual report within 30 days of January 1 describing the search conducted during the past twelve (12) months, results of the previous year's search, and schedule of switching to material with lower pentane and VOC content if the material is available. Compliance with this condition will fulfill the requests of 326 IAC 8-1-6.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activity:

1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.
2) Welding operations consisting of the following equipment:
   (a) Miller matic wire welder, identified as MS-1;
   (b) Small torch, identified as MS-2;
   (c) Dialarc stick welder, identified as MS-3;
   (d) Dialarc stick welder, identified as MS-4;
   (e) Miller matic wire welder, identified as MS-5;
   (f) Medium torch, identified as MS-6;
   (g) Miller matic wire welder, identified as MS-7;
   (h) Medium torch set, identified as MS-8;
   (i) Dialarc stick welder, identified as MS-9; and
   (j) Medium torch set, identified as MS-10.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate emission limitations for sources of indirect heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions of the 8.4 MMBtu per hour boiler shall be limited to 0.05 pounds per MMBtu, which was determined by the following equation:

$$Pt = 1.09/Q^{0.26}$$

Pt = Pounds of particulate matter emitted per million Btu heat input
Q = Total source maximum operating capacity rating in million Btu per hour heat input

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.4 Monitoring

The boiler shall combust only natural gas.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Polyfoam Packers Corporation
Source Location:	955 Woodland Avenue, Michigan City, IN 46360
County:	LaPorte
SIC Code:	3086
Operation Permit No.:	T091-7666-00079
Operation Permit Issuance Date:	October 14, 1999
Significant Source Modification No.:	091-15084-00079
Significant Permit Modification No.:	091-15559-00079
Permit Reviewer:	NH/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Polyfoam Packers Corporation relating to the operation of a polystyrene shape molding operation.

History

On November 26, 2001, Polyfoam Packers Corporation submitted an application to the OAQ requesting to add sixteen (16) post expansion storage silos to their existing plant. Polyfoam Packers Corporation was issued a Part 70 permit on October 14, 1999.

Insignificant Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following insignificant unpermitted facilities/units:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu per hour:

(1) Sterling heater, rated at 0.4 MMBtu/hr, identified as MS-11;
(2) Grinnell heater, rated at 0.4 MMBtu/hr, identified as MS-12;
(3) Trane heater, rated at 0.25 MMBtu/hr, identified as MS-13;
(4) Reznor heater, rated at 0.3 MMBtu/hr, identified as MS-14;
(5) Trane heater, rated at 0.25 MMBtu/hr, identified as MS-15;
(6) Dayton heater, rated at 0.4 MMBtu/hr, identified as MS-16;
(7) Dayton heater, rated at 0.2 MMBtu/hr, identified as MS-17;
(8) Thermo Cycler, rated at 0.4 MMBtu/hr, identified as MS-18;
(9) Thermo Cycler, rated at 0.58 MMBtu/hr, identified as MS-19;
(10) Dayton heater, rated at 0.06 MMBtu/hr, identified as MS-20;
(11) Trane heater, rated at 0.25 MMBtu/hr, identified as MS-21;
(12) Dayton heater, rated at 0.4 MMBtu/hr, identified as MS-22;
(13) Dayton heater, rated at 0.4 MMBtu/hr, identified as MS-23;
(14) Trane rooftop, rated at 0.166 MMBtu/hr, identified as MS-24;

(15) Trane rooftop, rated at 0.166 MMBtu/hr, identified as MS-25;
(16) Trane rooftop, rated at 0.06 MMBtu/hr, identified as MS-26;
(17) Thermo Cycler, rated at 0.4 MMBtu/hr, identified as MS-27;
(18) Thermo Cycler, rated at 0.4 MMBtu/hr, identified as MS-28;

(b) Welding operations consisting of the following equipment:

(1) Miller matic wire welder, identified as MS-1;
(2) Small torch, identified as MS-2;
(3) Dialarc stick welder, identified as MS-3;
(4) Dialarc stick welder, identified as MS-4;
(5) Miller matic wire welder, identified as MS-5;
(6) Medium torch, identified as MS-6;
(7) Miller matic wire welder, identified as MS-7;
(8) Medium torch set, identified as MS-8;
(9) Dialarc stick welder, identified as MS-9; and
(10) Medium torch set, identified as MS-10.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-7-5(16):

(a) Sixteen (16) post expansion storage silos, identified as F28, each with a total maximum storage capacity of 972 pounds.

Existing Approvals

The source was issued a Part 70 Operating Permit T091-7666-00079 on October 14, 1999. The source has since received the following:

(a) First Administrative Amendment No.: 091-11627-00079, issued on January 18, 2000;

(b) First Minor Source Modification No.: 091-12933-00079, issued on January 4, 2001;

(c) Second Administrative Amendment No.: 091-13602-00079, issued on January 17, 2001;

(d) First Significant Source Modification No.: 091-14438-00079, issued on November 2, 2001; and

(e) First Significant Permit Modification No.: 091-14496-00079, issued on November 20, 2001.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 26, 2001. Additional information was received on January 10, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 2).

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	77.16
PM-10	0.18
SO_2	0.01
VOC	77.23
CO	2.02
NO_x	2.40

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4)(D) because the source has the potential to emit VOC greater than 25 tons per year. This source modification will give the source approval to construct the new emission units.

This Part 70 Operating permit is also being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1) which states the following:

"Significant modification procedures shall be used for application requesting Part 70 permit modifications that do not qualify as minor permit modifications or as administrative amendments. Every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant".

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 100 less than 250
CO	less than 100
NOx	less than 100

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Title V (T091-7666-00079) issued to the source on October 14, 1999.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Existing Title V source	45.99	--	--	249	--	--	--
Post expansion storage silos	--	--	--	see note below*	--	--	--
Insignificant Activities (natural gas combustion)	0.05	0.18	0.01	0.13	2.02	2.40	--
Total Emissions	46.04	0.18	0.01	< 250	2.02	2.40	--

*The source has agreed to maintain the VOC limit of less than 249 tons per year even with the addition of the sixteen (16) new post expansion storage silos to their existing operation. Thus, the source will still maintain its PSD minor source status.
Also, there are no additional emissions from the sixteen (16) post expansion storage silos because the emissions increase from the sixteen (16) post expansion storage silos is offset by the decrease in emissions from the presses permitted in the Title V.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

There are no HAPs emitted from this modification. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. The welding operations listed in the insignificant activities section shall be subject to this limit.

(b) The sixteen (16) post expansion storage silos are not subject to 326 IAC 6-3-2 (Process Operations) because they do not emit any PM.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The sixteen (16) post expansion storage silos are not subject to this rule because each of the silos has the potential to emit (uncontrolled) VOC less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance requirements for the equipment covered under this approval.

Changes Proposed

1) The sixteen (16) new post expansion storage silos are being added to Section A.2 as follows.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

1) One (1) boiler, model number CB 700-250, fueled by natural gas, heat input rate is 10.5 MMBtu per hour and exhausting to stack S-1.

2) Thirty-one (31) foam polystyrene storage silos with a total maximum storage capacity of 76,000 pounds.

3) One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

4) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.

5) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.

6) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.

7) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.

8) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.

9) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

10) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

11) One (1) pre expander, rated at 500 pounds per hour and exhausting to stack S-5.

12) One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

13) Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

14) One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

15) One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

16) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

17) One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

18) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

19) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

20) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

21) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

22) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

23) One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

24) One (1) molding press, Kohler model 609, rated at 400 pounds per hour and exhausting to Stack S-10.

25) One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.

26) One (1) molding press, model number 813, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-29.

27) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-30.

28) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-31.

29) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-32.

30) One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-33.

31) One (1) molding press, model number EHV-C, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-34.

32) Sixteen (16) post expansion storage silos, identified as F28, each with a total maximum storage capacity of 972 pounds.

2) The sixteen (16) new post expansion storage silos are being added to the facility description in Section D.2 as follows:

Facility Description [326 IAC 2-7-5(15)]

Thirty-one (31) foam polystyrene storage silo with a maximum storage silo with a maximum storage capacity of 76,000 pounds.

One (1) polystyrene pre expander, model number 6000, rated at 1500 pounds per hour and exhausting to stack S-4.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-11.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-14.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-15.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-16.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-17.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-18.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-19.

One (1) pre expander, rated at 500 pounds per hour, exhausting to stack S-5.

One (1) # 2 pre expander, rated at 1500 pounds per hour, exhausting to stack S-6.

Two (2) molding presses, each rated at 150 pounds per hour, one exhausting to stack S-7 and the other press exhausting to stack S-8.

One (1) molding press, model number 812, rated at 300 pounds per hour, and exhausting to stack S-12.

One (1) molding presses, model number 812, rated at 300 pounds per hour and exhausting to stack S-13.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-20.

One (1) molding press, model number 68, rated at 150 pounds per hour, and exhausting to stack S-21.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-22.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-23.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-24.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-25.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-26.

One (1) molding press, model number BR 620, rated at 100 pounds per hour, and exhausting to stack S-27.

One (1) molding press, Kohler model 609, rated at 400 pounds per hour, and exhausting to Stack S-10.

One (1) molding press, model number 1317, identified as P001, rated at 600 pounds per hour, and exhausting to stack S-28.

One (1) molding press, model number 813, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-29.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-30.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-31.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-32.

One (1) molding press, model number 68, identified as P001, rated at 150 pounds per hour, and exhausting to stack S-33.

One (1) molding press, model number EHV-C, identified as P001, rated at 300 pounds per hour, and exhausting to stack S-34.

Sixteen (16) post expansion storage silos, identified as F28, each with a total maximum storage capacity of 972 pounds.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

3) The Title V permit (T091-7666-00079, issued on October 14, 1999) limits the VOC emissions from the source to less than 249 tons per year. The source has agreed to maintain this same limit even with the addition of the sixteen (16) new post expansion storage silos. This language is being added to Condition D.2.1.

D.2.1 Prevention of Significant Deterioration [326 IAC 2-2 and 40 CFR 52.21]

Pursuant to CP 091-4823-00079, issued on March 29, 1996, the molding process **and the sixteen (16) post expansion storage silos** shall use no more than 26.77 tons per month of pentane (VOC) (at 77.5% flash off). This usage limit is required to limit the potential to emit of VOC to 20.75 tons per month. Compliance with this limit makes the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21 not applicable.

4) The welding operations are being added to Section A.3 as follows.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.

2) Welding operations consisting of the following equipment:

(a) Miller matic wire welder, identified as MS-1;
(b) Small torch, identified as MS-2;
(c) Dialarc stick welder, identified as MS-3;
(d) Dialarc stick welder, identified as MS-4;
(e) Miller matic wire welder, identified as MS-5;
(f) Medium torch, identified as MS-6;
(g) Miller matic wire welder, identified as MS-7;
(h) Medium torch set, identified as MS-8;
(i) Dialarc stick welder, identified as MS-9; and
(j) Medium torch set, identified as MS-10.

5) The welding operation is being added to the facility description in Section D.3 as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activity:

1) One (1) boiler, model number CB 700-200, fueled by natural gas, heat input rate is 8.4 MMBtu per hour and exhausting to stack S-2.

2) Welding operations consisting of the following equipment:

(a) Miller matic wire welder, identified as MS-1;
(b) Small torch, identified as MS-2;
(c) Dialarc stick welder, identified as MS-3;
(d) Dialarc stick welder, identified as MS-4;
(e) Miller matic wire welder, identified as MS-5;
(f) Medium torch, identified as MS-6;
(g) Miller matic wire welder, identified as MS-7;
(h) Medium torch set, identified as MS-8;
(i) Dialarc stick welder, identified as MS-9; and
(j) Medium torch set, identified as MS-10.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

6) A new Condition D.3.2 is being added to Section D.3 to include the 326 IAC 6-3-2 requirements for the welding operations. The rest of Section D.3 will be re-numbered accordingly.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Conclusion

The operation of this polystyrene shape molding operation shall be subject to the conditions of the attached proposed **Significant Source Modification No. 091-15084-00079**.